

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA—BUTTE DIVISION**

IN RE: SNOWFLAKE, INC., DATA
SECURITY BREACH LITIGATION

2:24-MD-03126-BMM

**CO-LEAD COUNSEL’S
PROPOSED LEADERSHIP
STRUCTURE**

Pursuant to this Court’s Order (ECF No. 248), Co-Lead Counsel John Heenan, Amy Keller, Jason Rathod, J. Devlan Geddes, and Raphael Graybill submit this proposed supplemental Leadership Structure and its function in advancing the MDL.

1. The appointment of additional counsel.

After careful thought and consideration, in addition to Plaintiffs’ Executive Committee/Liaison Counsel of Jeff Ostrow, William Rossbach, and James Pizzirusso, Co-Lead Counsel propose that the Court appoint the following additional individuals as Plaintiffs’ Steering Committee:

- Caitlin Boland Aarab, Boland Aarab PLLP
- Jillian Dent, Stueve Siegel Hanson LLP¹

¹ Although Ms. Dent did not individually apply with this Court previously, her partner Norman Siegel did as part of a proposed slate (ECF No. 184). Plaintiffs’ Co-Lead Counsel has considered her resume and discussed the role and responsibilities with her and submit that she will make an excellent addition to the team.

- Andrew Ferich, Ahdoot & Wolfson, P.C.
- Gary Klinger, Milberg Coleman Bryson Phillips Grossman, PLLC
- David Paoli, Paoli Law Firm, P.C.
- Sean Petterson, Lieff Cabraser Heimann & Bernstein, LLP
- Daniel Robinson, Robinson Calcagnie, Inc.
- Christopher Seeger, Seeger Weiss LLP
- Sabita Soneji, Tycko & Zavareei LLP

These individuals were selected to assist in the litigation based upon several factors including experience, willingness to work directly on the case, ability to collaborate, as well as enhancing the diversity of experience and perspectives of those appointed by the Court.

2. The leadership structure of this case.

Co-Lead Counsel believe that a hybrid model of those previously proposed to the Court will best ensure that the case proceeds apace and that the interests of absent class members are protected. Their roles and functions in advancing the MDL are set forth below.

- **Law and Briefing Committee**

Chair: Jason Rathod

Additional Members: Raphael Graybill, Sabita Soneji, Amy Keller, James Pizzirusso, and Andrew Ferich

The Law and Briefing Committee will draft complaints and motions and respond to substantive filings throughout the litigation.

- **Consulting and Testifying Expert Committee**

Chair: Amy Keller

Additional Members: Jason Rathod, Jeffrey Ostrow, William Rossbach, and Sean Petterson

The Consulting and Testifying Expert Committee will vet and select experts, and work with experts to ensure that their opinions assist Co-Lead Counsel in the prosecution of this matter.

- **Third-Party and Investigative Committee**

Chair: Raphael Graybill

Additional Members: John Heenan, Jeffrey Ostrow, and Christopher Seeger

The Third-Party and Investigative Committee will work across committees to analyze additional information necessary for the litigation, obtaining information from third parties, regulators, investigative bodies, international sources, and any other entities to develop additional facts related to the case.

- **Offensive Discovery Committee**

Chair: John Heenan

Additional Members: Caitlin Aarab, James Pizzirusso, Jeffrey Ostrow, Daniel Robinson, and Jillian Dent

The Offensive Discovery Committee will advance discovery against Defendants in

the MDL to ensure that Co-Lead Counsel has the discovery necessary to enable the effective litigation of this matter from the Defendants and third parties.

- **Plaintiff Vetting and Defensive Discovery Team**

Chair: J. Devlan Geddes

Additional Members: Amy Keller, Gary Klinger, and David Paoli

This Committee will be responsible for the selection of Plaintiffs which meet the requirements of Federal Rule of Civil Procedure 23(a)(4) for their inclusion in complaints filed against the Defendants to advance issues in this MDL, as well as oversee responsive discovery related to the named Plaintiffs.

- **Settlement Team**

Chair: John Heenan

Additional Members: Amy Keller, J. Devlan Geddes, Jeffrey Ostrow, and Gary Klinger will oversee any settlements which are entered into as part of the MDL, drawing upon additional counsel, as they deem appropriate, to negotiate and effectuate settlements.

3. Case Management Team

In order to ensure a single point of contact and “start-to-finish” case oversight, in addition to the above task-specific committees, Co-Lead Counsel designate the following attorneys to serve as liaisons/managers as to the following Defendants:

- **Snowflake:** Amy Keller, Andrew Ferich

- Ticketmaster: Jason Rathod, Dan Robinson
- AT&T: John Heenan, Chris Seeger
- Lending Tree: Raphael Graybill, James Pizzirusso
- Advanced Auto: J. Devlan Geddes, Gary Klinger
- Neiman Marcus: Raphael Graybill, Jeffrey Ostrow
- Hot Topic: J. Devlan Geddes, William Rossbach

Each individual will liaise with members of the Plaintiffs' Executive Committee and Plaintiffs' Steering Committee to ensure the effective and efficient litigation of this matter.

4. Ensuring efficiency and accountability.

While some Co-Lead Counsel has been designated for specific issue areas to facilitate an efficient workflow, as outlined above, counsel will have shared responsibility and authority over these areas and the prosecution of the MDL as a whole. Accordingly, each Co-Lead will provide input and oversight into all other issues in order to ensure that the case is litigated in a consistent manner, with a focus on ensuring the most efficient and just outcome.

Respectfully submitted,

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Co-Lead Counsel on Behalf of the
Putative Class Members

CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2024, an accurate copy of the foregoing document was served electronically through the Court's CM/ECF system on registered counsel.

/s/ Raphael Graybill
Raphael Graybill

Co-Lead Counsel